

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ORIGINAL

UNITED STATES OF AMERICA

vs.

Case:2:18-cr-20255
Judge: Roberts, Victoria A.
MJ: Whalen, R. Steven
Filed: 04-16-2018 At 11:48 AM
INFO USA VS TENAGLIA (DP)

**VIOLATION: 18 U.S.C. § 1349
(Wire fraud conspiracy)**

D-1 GARY TENAGLIA,

Defendant.

_____ /

INFORMATION

The United States Attorney charges:

GENERAL ALLEGATIONS

At all times relevant to this Information, all of the following was true:

1. **GARY TENAGLIA** was the owner of Envision Engineering & Maintenance, LLC ("Envision").
2. Between in or about May of 2011, through June of 2014, Envision had contracts with the Wayne County Airport Authority ("WCAA") to provide maintenance for the Blue Deck parking structure at Detroit Metropolitan Airport.
3. Envision's contract included, among other services, the removal of snow and ice.

4. On June 30, 2014, an internal audit of the bills paid by the WCAA revealed that **GARY TENAGLIA** and Envision fraudulently charged the WCAA for the application of approximately \$1,500,000 worth of a deicing substance called “NAAC,” that Envision did not, in fact, apply.

COUNT ONE

(18 U.S.C. § 1349– Wire Fraud Conspiracy)

D-1 GARY TENAGLIA

1. The general allegations are hereby realleged and incorporated by reference in this count as if fully set forth herein.

2. Beginning in 2012, and continuing through 2014, in the Eastern District of Michigan, Southern Division, the defendant, **GARY TENAGLIA**, along with at least two other individuals, did unlawfully and knowingly conspire and agree with each other and with other individuals to commit the crime of wire fraud, by knowingly executing and attempting to execute a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

3. On May 2, 2014, in executing the scheme to defraud, **GARY TENAGLIA** transmitted and caused the transmission of wire communications in interstate commerce. These communications included email, writings, signs, signals, pictures and sounds for the purpose of executing the scheme. Specifically,

on May 2, 2014, in order to further his fraud scheme, **GARY TENAGLIA** sent an email from his office in the Eastern District of Michigan that traveled interstate, in violation of Title 18, United States Code, Section 1343. That email included a false invoice of a co-conspirator purporting to show that Envision had purchased NAAC deicer when it had, in fact, not done so.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

Upon conviction for the conduct alleged in Count One of the Information, the defendant shall, pursuant to Title 18, United States Code, Section 981(a)(1)(C) forfeit to the United States, any property, real or personal, which constitutes the proceeds obtained, directly or indirectly, as a result of the commission of the alleged conduct.

Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or

(e) Has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek to forfeit any other property of defendant up to the value of the above-described property subject to forfeiture.

MATTHEW SCHNEIDER
United States Attorney



R. MICHAEL BULLOTTA
Assistant United States Attorney



DAVID A. GARDEY
Assistant United States Attorney
Chief, Public Corruption Unit

Dated: April 16, 2018

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>BMZ</u>

Case Title: USA v. D-1 GARY TENAGLIA

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☒ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 16, 2018
 Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.